

Discussion Points
Washington, D.C. Meetings October 18-19

1. Reverse Auction:

USF distribution based on a Reverse Auction Model (least cost of service across the most customers) will make Alaska's rural carriers non-competitive. Alaska's rural areas have the highest cost of service per capita in the nation. Least cost modeling that is dependent on determining the least cost for support would hinder the expansion of wireless services in Alaska where expanded services are the most needed.

2. Middle Mile:

Alaska's rural broadband access will not increase without extension of non-satellite middle mile infrastructure. Any USF reform must include support for non-satellite middle mile expansion for Alaska.

3. Tribal Lands:

Many areas of Alaska have no wireless service and most rural areas have, at best, 2G levels of service. Expansion of 4G service to areas of the country should not be extended at the cost of limited or no service in Alaska.

USF reform must continue to recognize the need to maintain the definition and treatment of Alaska Native Regions as established in the current Competitive Eligible Telecommunications Carrier (CETC) interim cap exemption for ongoing high cost support. USF reform must also include provisions for full support for ongoing costs of all telecommunications services in Alaska, from wire line to wireless and broadband.

4. State Regulatory Authority:

USF reform must not diminish current state regulatory authority and oversight of intrastate rate policies and USF delivery through eligible carriers.

USF reform must not penalize Alaska and other states that have already implemented ICC reform by reducing USF revenues or increasing local end user monthly fees.